



Nevada Division of Environmental Protection Chemical Accident Prevention Program Element Audit Checklist



Facility:	Process(es) Covered:	Date:	
V. TRAINING PROGRAM			
A. RECORDS AUDIT/REVIEW			
1) EXISTENCE OF EFFECTIVE TRAINING PROGRAM			
a. Compliance of Facility Program with Specific Code Requirements	NAC Ref.	Resp. Code	
i. Does a well defined program for Training process operating personnel in the Standard Operating Procedures and Safe Work Practices appear to exist (i.e. are the required components of the training element, sections 2 through 6, satisfied)?	459.95418		
ii. Does the written Training procedure/policy provide for training documents and instruction in a language understood by the operator AND is the policy implemented?	459.95418		
b. Potential Enhancements to Facility Program		Resp. Code	
i. Although compliance is not required by the Training element, NAC 459.95418, does review of the operator training records indicate that training was received in Management of Change? If not, the auditor may want to review the MOC program further.			
ii. Although compliance is not required by the Training element, NAC 459.95418, does review of the operator training records indicate that training was received in the Emergency Response Plan? If not, the auditor may want to review the Emergency Response Program further.			
iii. Is there a specific format or structure for the Training Program procedure/policy which distinguishes it from other facility documents, i.e., unique heading, border, etc?			
iv. If a specific Training Program procedure/policy format exists, is the format the same for all pages, i.e., do all pages have the same heading, title block, etc?			
v. Is Training Program procedure/policy assigned an ID number (in addition to its title)?			
vi. Is the revision date and/or revision sequence identified on the Training procedure/policy?			
vii. Does each page of the Training Program procedure/policy have a revision date or sequence to allow for revising and distributing a single page instead of the entire document due to a minor change?			
viii. Are the pages of the Training Program procedure/policy numbered?			
ix. Does written Training Program procedure/policy provide sufficient detail to adequately describe how to fully implement program requirements?			
x. Does written Training Program procedure/policy describe how actual training is to be conducted (specific training sessions, work study, individually or as a group, etc)?			
xi. Does written Training Program procedure/policy describe how training requirements are determined or developed for various personnel, i.e., a training needs analysis?			
xii. Does written Training Program procedure/policy specify what personnel (positions) are responsible for coordination/oversight?			



Notes/Comments Pertaining to Responses to Questions under Issue 2):		
3) REFRESHER TRAINING		
a. Compliance of Facility Program with Specific Code Requirements	NAC Ref.	Resp. Code
i. Does the facility provide Refresher Training at least every 3 years, and more often if necessary, to each employee involved in operating a process, in order to ensure that the employee understands and adheres to the current SOPs (consider records review under part B and employee interviews under part C of this checklist)?	459.95418(3)	
ii. Is the requirement to provide Refresher Training documented in policy or procedure?	459.95418	
iii. Does the facility management consult with operating personnel to determine the appropriate frequency of Refresher Training (consider records review under part B and employee interviews under part C of this checklist)?	459.95418(3)	
iv. Is the requirement to consult with operating personnel, with regard to Refresher Training, documented in policy or procedure?	459.95418	
b. Potential Enhancements to Facility Program		Resp. Code
i. Does Refresher Training cover Safe Work Practices, such as Hot Work, Confined Spaces, L-O/T-O, etc?		
ii. Does written Training Program policy/procedure establish trainer qualification criteria for initial training?		
Notes/Comments Pertaining to Responses to Questions under Issue 3):		
4) AREAS OF TRAINING		
a. Compliance of Facility Program with Specific Code Requirements	NAC Ref.	Resp. Code
i. Is there a Training Syllabus for EACH position that operates this process, related to Initial Training?	459.95418(4)	
ii. Is there a Training Syllabus for EACH position that operates this process, related to Refresher Training?	459.95418(4)	



iii.	Does it appear that each position that operates this process is required to have Training in the appropriate Operational and Safety areas (compare training syllabus to job responsibilities related in employee interviews under part C of the checklist and responsibilities as related by management)?	459.95418(1)	
b. Potential Enhancements to Facility Program			Resp. Code
i.	Does the Syllabus denote Duration of Training?		
ii.	Does the Syllabus denote whether Training is based in the Classroom, Field or OJT?		
iii.	Does the Syllabus denote if the Training is Initial or Refresher and the Refresher Frequency, if applicable?		
iv.	Does the Syllabus denote the Pass/Fail criteria?		
v.	Does the Syllabus denote the Retest Criteria?		
Notes/Comments Pertaining to Responses to Questions under Issue 4):			
5) EVALUATION OF EMPLOYEE COMPREHENSION OF TRAINING			
a.	Compliance of Facility Program with Specific Code Requirements	NAC Ref.	Resp. Code
i.	Does the facility ascertain whether each employee involved in operating a process has comprehended the Training (consider records review under part B and employee interviews under part C of this checklist)?	459.95418(5)	
ii.	Is the requirement to ascertain Comprehension (i.e. administer a test) documented in policy or procedure?	459.95418	
iii.	Whether oral, written, observation of job performance, or a combination of methods is used to determine Comprehension, is the Test Content documented (note: even an oral test administered in the field must have documented criteria for evaluation)?	459.95418(6)	
iv.	Is a Passing/Failing criteria established for each Test (consider records review under part B and employee interviews under part C of this checklist)?	459.95418(5)	
v.	Is performance of the employee in the defined operational position dependent upon achieving a passing score on the comprehension test?	459.95418(5)	
vi.	Is employee Comprehension evaluated in the manner described above for both Initial and Refresher Training?	459.95418(5)	
vii.	Does the Test appear to adequately evaluate knowledge and skills required by the individual to operate the process safely (consider records review under part B and employee interviews under part C of this checklist)?	459.95418(5)	
b. Potential Enhancements to Facility Program			Resp. Code



i.	Does the pertinent process area foreman or supervisor perform the evaluation of the operators process knowledge (OJT)?	
ii.	Does the Training Program procedure/policy identify the individuals (positions) responsible for developing test questions?	
iii.	Are test questions selected from a large pool of such questions to allow for varying the content each time the test is administered?	
iv.	Does Training Program procedure/policy specify Retest Guidelines when a passing grade is not achieved, i.e., how soon can a test be retaken and what additional training or review must be undertaken in the interim?	
v.	Does Training Program procedure/policy specify how many times a test can be retaken, and what happens when a passing grade is not achieved on the final retake (job downgrade, termination, etc)?	
vi.	Is a certificate or other document of recognition awarded to personnel who successfully complete Training Program requirements?	
Notes/Comments Pertaining to Responses to Questions under Issue 5):		
6) TRAINING DOCUMENTATION		
a.	Compliance of Facility Program with Specific Code Requirements	Resp. Code
i.	Does the facility maintain Records of the Training required by this section for each employee (consider records review under part B of this checklist)?	459.95418(6)
ii.	Is the requirement to maintain Training Records documented in policy or procedure?	459.95418
iii.	Do the Training Records include: - the identity of the employee - the date of training - the substance of the training provided on that date - the means used to verify that the employee comprehended the training?	459.95418(6)
b.	Potential Enhancements to Facility Program	Resp. Code
i.	Does Training Program utilize a matrix identifying personnel by name or position on one axis and training topics on the other axis, with an identification of what training topics are required for each employee?	
ii.	Does Training Program utilize an individual file or record for each employee to document training requirements and results?	
iii.	Does Training Program utilize an individual file or record by training topic or subject matter to document requirements and results?	
iv.	Are all original Training Program records kept at one location?	
v.	Does Training Program record keeping system identify Schedule or Due Date for each specific Training Topic?	



B. ON-SITE INSPECTION				
1) SELECT 2 TO 4 TRAINING FILES/RECORDS TO REVIEW AGAINST ACTUAL PRACTICE. LIST ON THE FOLLOWING TABLE:				
#	Employee ID # or Name	Description -Title of Operator Position (note initial or refresher training)		
i				
ii				
iii				
iv				
Inquiry/Observation			Resp. Code :	
			i	ii
Required Training Topics (Y - indicates documented training & passing score on test, refer to training syllabus for specific classes)				
a. Overview of the process (including process flows, equipment & instruments involved, key operating variables, reading process flow diagrams, reading piping & instrument diagrams)				
b. Layout of the plant (physical layout of process, including pipe routing)				
c. Location of equipment and instruments				
Relevant Standard Operating Procedures (also refer to NAC 459.95416)				
d. Initial StartUp procedures (for commissioning of new process)				
e. Normal Operating procedures				
f. Temporary Operating procedures				
g. Emergency ShutDown procedures				
h. Emergency Operating procedures				
i. Normal ShutDown procedure for Turnaround				
j. Shutdown procedure to place in Standby Mode of Operation (i.e. 'warm shutdown')				
k. StartUp procedure following a Turnaround				
l. StartUp procedure following an Emergency Shutdown or 'Warm Shutdown'				
m. Safe Operating Limits				
n. Safety and Health considerations				
o. Safety System Description				
Relevant Safe Work Practices (also refer to NAC 459.95416 & 459.95433)				
p. LockOut/Tagout				
q. Confined Space Entry				
r. Opening Process Equipment or Piping (Linebreaking)				



s. Entrance into facility by maintenance, contractor, or other support personnel				
t. Hot Work				
u. Other Safe Work Practices				
Recommended Training Topics				
aa. Chemical Accident Prevention Program Elements (refer to NAC 459.95412 through 459.95442) (note: While training on the intent of each of the CAPP elements is not mandated by regulation, employee understanding of these elements is critical to ensure effective element implementation, which IS mandated by CAPP)				
ab. Basic Math and Science				
ac. Process Fundamentals training (overview of chemical plant equipment and instruments)				
Notes/Comments Pertaining to Responses to Questions under Issue 1):				
2) VERIFY THAT TRAINING RECORDS ARE ACCESSIBLE AND CURRENT				Resp. Code
a. Does observation indicate that training schedules or matrices are present on site?				
b. Does observation indicate that copies of training files or records are present on site?				
c. Does it appear that required training is current for all employees operating the process?				
d. Is there documentation indicating that employees have been consulted on frequency of refresher training?				
Notes/Comments Pertaining to Responses to Questions under Issue 2):				



General On-Site Inspection Notes/Comments:



C. INTERVIEWS	
1) SELECT TWO OR MORE OPERATING PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE TRAINING PROGRAM USING THE FOLLOWING QUESTION SETS. (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)	
Question Set	Question Options/Phrasing
a	What is your responsibility?
b	Were you provided an overview of how the entire process works? How was the overview presented? Were you instructed in plant layout and in equipment and instrument location? How? Were you taught how to read process flow diagrams and piping and instrument diagrams? How? Were you tested on the overview, plant layout and reading the diagrams? How? Can you explain how the process works (get walkthrough with explanation of main process flows and controls plus a general description of their duties)? Do you feel that the training was adequate in this area (i.e. instruction and materials understandable, everything appeared to be covered)? Suggested improvements?
c	Do you know which Standard Operating Procedures (SOPs) apply to your job (look for knowledge of job description and training syllabus)? Were you trained in the SOPs applicable to your position? How? Were Safe Operating Limits, the Consequences of Deviating from the limits, and how to Correct Deviations, addressed during SOP training? How? Was the Safety System Description reviewed? Were you tested in the SOPs? How? Do you feel that the training was adequate in this area (i.e. instruction and materials understandable, everything appeared to be covered)? Suggested improvements?
d	What kind of training related to Safety & Health have you had? Have you been trained in the hazards of the substances and on MSDS sheets (i.e. HAZCOM training)? Have you learned how to protect yourself from exposure to hazardous substances (look for PPE training and availability, knowledge of gas sensors, locations and setpoints)? Have you learned what to do if exposed to hazardous substances? Were you tested on Safety & Health topics covered in training? Do you feel that the training was adequate in this area (i.e. instruction and materials understandable, everything appeared to be covered)? Suggested improvements?



e	<p>Do you issue permits, such as Hot Work, Confined Space and LockOut/TagOut, to perform work in your process area?</p> <p>Have you been trained in Safe Work Procedures such as Hot Work, Confined Space and LockOut/TagOut? How?</p> <p>Were you tested on the Safe Work Procedures covered in training? How?</p> <p>What is your role in implementing [<i>select a safe work practice</i>] (look for an understanding of the permit system, how they perform their task and the responsibilities of other parties)?</p> <p>Can you explain how the process works (get walkthrough with explanation of main process flows and controls plus a general description of their duties)?</p> <p>Do you feel that the training was adequate in this area (i.e. instruction and materials understandable, everything appeared to be covered)?</p> <p>Suggested improvements?</p>		
f	<p>Were you involved in determining the frequency and scope of Refresher Training?</p> <p>Are you tested on the Refresher Training?</p> <p>How does Refresher Training compare to the Initial Training, i.e., is it less involved?</p> <p>Do you feel that Refresher Training covers the appropriate topics and is performed often enough?</p> <p>Do you receive Refresher Training individually or as part of a group?</p> <p>Suggested improvements?</p>		
g	<p>Do you feel that the tests adequately evaluated your knowledge of the training (were the tests too easy, could they be passed without adequate knowledge of the training)?</p> <p>Is performance of your duties contingent upon passing the tests (i.e. What happens if you don't pass)?</p>		
2) RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS			
Employee Profile			
Job Title/Position	Department/Unit/Group	Yrs in Job	Yrs w/Co.
<p>Response to Question Set _:</p>			



Response to Question Set _:

Response to Question Set _:

Response to Question Set _:

Response to Question Set _:



Response to Question Set _:

Response to Question Set _: